

BEFORE THE
BOARD OF VOCATIONAL NURSING
AND PSYCHIATRIC TECHNICIANS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Statement of Issues
Against:

Case No. VN-2010-2141

SAMIRA A. ELBEKRAOUI
2111 Summit Drive
Escondido, CA 92025

OAH No. 2012020347

Applicant for Vocational Nurse License

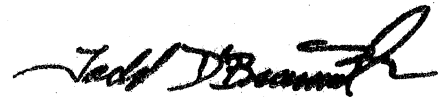
Respondent.

DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Vocational Nursing and Psychiatric Technicians as the final Decision in the above-entitled matter.

This Decision shall become effective on September 16, 2012.

IT IS SO ORDERED this 17th day of August, 2012.



Todd D'Braunstein, PT
President

1 KAMALA D. HARRIS
Attorney General of California
2 LINDA K. SCHNEIDER
Supervising Deputy Attorney General
3 State Bar No. 101336
AMANDA DODDS
4 Senior Legal Analyst
110 West "A" Street, Suite 1100
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 645-2141
7 Facsimile: (619) 645-2061
Attorneys for Complainant

8
9 **BEFORE THE**
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Statement of Issues
12 Against:

13 **SAMIRA AMALE EL-BEKRAOUI**

14 **Vocational Nurse License Applicant**

15 Respondent.

Case No. VN-2010-2141

OAH No. 2012020347

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

16
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
18 entitled proceedings that the following matters are true:

19 **PARTIES**

20 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) is the Executive Officer of the
21 Board of Vocational Nursing and Psychiatric Technicians. She brought this action solely in her
22 official capacity and is represented in this matter by Kamala D. Harris, Attorney General of the
23 State of California, by Amanda Dodds, Senior Legal Analyst.

24 2. Respondent Samira Amale El-Bekraoui (Respondent) is representing herself in this
25 proceeding and has chosen not to exercise her right to be represented by counsel.

26 3. On or about October 28, 2010, Respondent filed an application dated September 7,
27 2010, with the Board of Vocational Nursing and Psychiatric Technicians to obtain a Vocational
28 Nurse License.

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JURISDICTION

4. Statement of Issues No. VN-2010-2141 was filed before the Board of Vocational Nursing and Psychiatric Technicians (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Statement of Issues and all other statutorily required documents were properly served on Respondent on January 19, 2012. The Statement of Issues No. VN-2010-2141 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Statement of Issues No. VN-2010-2141. Respondent has also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Statement of Issues; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Statement of Issues No. VN-2010-2141.

9. Respondent agrees that her Vocational Nurse License application is subject to denial and she agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

CONTINGENCY

10. This stipulation shall be subject to approval by the Board of Vocational Nursing and Psychiatric Technicians. Respondent understands and agrees that counsel for Complainant and

1 the staff of the Board of Vocational Nursing and Psychiatric Technicians may communicate
2 directly with the Board regarding this stipulation and settlement, without notice to or participation
3 by Respondent. By signing the stipulation, Respondent understands and agrees that she may not
4 withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers
5 and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the
6 Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this
7 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not
8 be disqualified from further action by having considered this matter.

9 11. The parties understand and agree that facsimile copies of this Stipulated Settlement
10 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and
11 effect as the originals.

12 12. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
13 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
14 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
15 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
16 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
17 writing executed by an authorized representative of each of the parties.

18 13. In consideration of the foregoing admissions and stipulations, the parties agree that
19 the Board may, without further notice or formal proceeding, issue and enter the following
20 Disciplinary Order:

21 **DISCIPLINARY ORDER**

22 IT IS HEREBY ORDERED that the application of Respondent Samira Amale El-Bekraoui
23 for licensure is hereby granted. Upon successful completion of the licensure examination and all
24 other licensing requirements, a Vocational Nurse License shall be issued to Respondent. Said
25 license will be immediately revoked, the revocation will be stayed, and the Respondent placed on
26 three (3) years probation on the following terms and conditions.

27 1. **OBEY ALL LAWS.** Respondent shall obey all federal, state and local laws,
28 including all statutes and regulations governing the license. Respondent shall submit, in writing, a

1 full and detailed account of any and all violations of the law, including alleged violations, to the
2 Board within five (5) days of occurrence.

3 To ensure compliance with this condition, respondent shall submit fingerprints through the
4 Department of Justice and Federal Bureau of Investigation within thirty (30) days of the effective
5 date of the decision, unless the Board determines that fingerprints were previously submitted by
6 the respondent to the Board.

7 Respondent shall also submit to the Board a recent 2" x 2" photograph of herself within
8 thirty (30) days of the effective date of the decision.

9 If respondent is under a criminal court order, including probation or parole, and the order is
10 violated, it shall be deemed a violation of these probation conditions.

11 2. **COMPLIANCE WITH PROBATION PROGRAM.** Respondent shall fully
12 comply with the conditions of probation established by the Board and shall cooperate with
13 representatives of the Board in its monitoring and investigation of the respondent's compliance
14 with the Probation Program.

15 Upon successful completion of probation, the respondent's license will be fully restored.

16 3. **SUBMIT WRITTEN REPORTS.** Respondent shall submit or cause to be
17 submitted, under penalty of perjury, any written reports, declarations and verification of actions
18 as required by the Board or its representatives. These reports or declarations shall contain
19 statements relative to respondent's compliance with all the conditions of the Board's Program.
20 Respondent shall immediately execute all release of information forms as may be required by the
21 Board or its representatives.

22 In the first report, Respondent shall provide a list of all states and territories where she has
23 ever been licensed as a vocational/practical nurse, psychiatric technician, or registered nurse.
24 Respondent shall provide information regarding the status of each license and any change in
25 license status during the period of probation. Respondent shall inform the Board if she applies for
26 or obtains a new nursing or psychiatric technician license during the period of probation.

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Respondent shall provide a copy of the Board's decision to the regulatory agency in every state and territory in which she has applied for or holds a vocational/practical nurse, psychiatric technician and/or registered nurse license.

4. NOTIFICATION OF ADDRESS AND TELEPHONE NUMBER CHANGE(S).

Respondent shall notify the Board, in writing, within five (5) days of any change in address or telephone number(s).

Respondent's failure to claim mail sent by the Board may be deemed a violation of these probation conditions.

5. NOTIFICATION OF RESIDENCY OR PRACTICE OUTSIDE OF STATE.

Respondent shall notify the Board, in writing, within five (5) days, if she leaves California to reside or practice in another state. Periods of residency or practice outside of California shall not apply toward a reduction of this probation time period. If Respondent resides or practices outside of California, the period of probation shall be automatically extended for the same time period she resides or practices outside of California. The respondent shall provide written notice to the Board within five (5) days of any change of residency or practice.

Respondent shall notify the Board, in writing, within five (5) days, upon her return to California.

6. MEETINGS WITH BOARD REPRESENTATIVE(S). Respondent shall appear

in person at meetings as directed by the Board or its designated representatives.

7. NOTIFICATION TO EMPLOYER(S). When currently employed or applying for

employment in any capacity in any health care profession, Respondent shall notify her employer of the probationary status of Respondent's license. This notification to the Respondent's current health care employer shall occur no later than the effective date of the Decision. The respondent shall notify any prospective health care employer of her probationary status with the Board prior to accepting such employment. At a minimum, this notification shall be accomplished by providing the employer or prospective employer with a copy of the Board's Accusation and Disciplinary Decision.

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1 The Health Care Profession includes, but is not limited to: Licensed Vocational Nurse,
2 Psychiatric Technician, Registered Nurse, Medical Assistant, Paramedic, Emergency Medical
3 Technician, Certified Nursing Assistant, Home Health Aide, and all other ancillary technical
4 health care positions.

5 Respondent shall cause each health care employer to submit to the Board all performance
6 evaluations and any other employment related reports as required by the Board. Respondent shall
7 notify the Board, in writing, of any difficulty in securing employer reports within five (5) days of
8 such an event.

9 Respondent shall notify the Board, in writing, within five (5) days of any change in
10 employment status. Respondent shall notify the Board, in writing, if she is terminated or
11 separated, regardless of cause, from any nursing or health care related employment with a full
12 explanation of the circumstances surrounding the termination or separation.

13 8. **EMPLOYMENT REQUIREMENTS AND LIMITATIONS.** Respondent shall
14 work in her licensed capacity in the state of California. This practice shall consist of no less than
15 six (6) continuous months and of no less than twenty (20) hours per week.

16 Respondent shall not work for a nurses' registry or in any private duty position, a temporary
17 nurse placement agency, as a faculty member in an accredited or approved school of nursing, or
18 as an instructor in a Board approved continuing education course except as approved, in writing,
19 by the Board. Respondent shall work only on a regularly assigned, identified and predetermined
20 work site(s) and shall not work in a float capacity except as approved, in writing, by the Board.

21 9. **SUPERVISION REQUIREMENTS.** Before commencing or continuing
22 employment in any health care profession, Respondent shall obtain approval from the Board of
23 the supervision provided to the respondent while employed.

24 Respondent shall not function as a charge nurse (i.e., work in any healthcare setting as the
25 person who oversees or directs licensed vocational nurses, psychiatric technicians, certified
26 nursing assistants or unlicensed assistive personnel) or supervising psychiatric technician during
27 the period of probation except as approved, in writing, by the Board.

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1 10. **COMPLETION OF EDUCATIONAL COURSE(S).** Respondent, at her own
2 expense, shall enroll and successfully complete a course(s) substantially related to the violation(s)
3 no later than the end of the first year of probation.

4 The coursework shall be in addition to that required for license renewal. The Board shall
5 notify the respondent of the course content and number of contact hours required. Within thirty
6 (30) days of the Board's written notification of assigned coursework, Respondent shall submit a
7 written plan to comply with this requirement. The Board shall approve such plan prior to
8 enrollment in any course of study.

9 Upon successful completion of the course, respondent shall submit "original" completion
10 certificates to the Board within thirty (30) days of course completion.

11 11. **MAINTENANCE OF VALID LICENSE.** Respondent shall, at all times, maintain
12 an active current license with the Board including any period of suspension.

13 If an initial license must be issued (Statement of Issues) or a license is reinstated, probation
14 shall not commence until a license is issued by the Board. Respondent must complete the
15 licensure process within two (2) years from the effective date of the Board's decision.

16 Should Respondent's license expire, by operation of law or otherwise, upon renewal or
17 reinstatement, Respondent's license shall be subject to any and all conditions of this probation not
18 previously satisfied.

19 12. **LICENSE SURRENDER.** During probation, if Respondent ceases practicing due to
20 retirement, health reasons, or is otherwise unable to satisfy the conditions of probation,
21 Respondent may surrender her license to the Board. The Board reserves the right to evaluate
22 Respondent's request and to exercise its discretion whether to grant the request without further
23 hearing. Upon formal acceptance of the tendered license, Respondent will no longer be subject to
24 the conditions of probation.

25 Surrender of Respondent's license shall be considered a disciplinary action and shall
26 become a part of Respondent's license history with the Board. A licensee who surrenders her
27 license may petition the Board for reinstatement no sooner than the following minimum periods
28 from the effective date of the disciplinary decision for the surrender:

1 Three (3) years for reinstatement of a license surrendered for any reason other than a mental
2 or physical illness; or One (1) year for a license surrendered for a mental or physical illness.

3 13. **CHEMICAL DEPENDENCY SUPPORT & RECOVERY GROUPS.** Within
4 five (5) days of the effective date of the Decision, Respondent shall begin attendance at a
5 chemical dependency support group (e.g. Alcoholics Anonymous, Narcotics Anonymous, Nurse
6 Support Group). Verified documentation of attendance shall be submitted by the respondent with
7 each written report as required by the Board. Respondent shall continue attendance in such a
8 group for the duration of probation.

9 14. **ABSTAIN FROM CONTROLLED SUBSTANCES.** Respondent shall completely
10 abstain from the personal use or possession of controlled substances, as defined in the California
11 Uniform Controlled Substances Act, and dangerous drugs as defined in Section 4021 and 4022 of
12 the Business and Professions Code, except when lawfully prescribed by a licensed practitioner for
13 a bona fide illness.

14 15. **ABSTAIN FROM USE OF ALCOHOL.** Respondent shall completely abstain
15 from the use of alcoholic beverages and products containing alcohol.

16 16. **VIOLATION OF PROBATION.** If Respondent violates the conditions of her
17 probation, the Board, after giving the respondent notice and an opportunity to be heard, may set
18 aside the stay order and impose the stayed revocation of the respondent's license. If during
19 probation, an accusation or petition to revoke probation has been filed against the respondent's
20 license or the Attorney General's Office has been requested to prepare an accusation or petition to
21 revoke probation against the respondent's license, the probationary period shall automatically be
22 extended and shall not expire until the accusation or petition has been acted upon by the Board.

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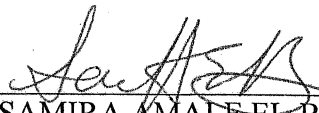
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ACCEPTANCE

I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my Vocational Nurse License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Vocational Nursing and Psychiatric Technicians.

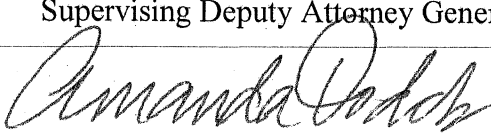
DATED: May 30th, 2012 
SAMIARA AMALE EL-BEKRAOUI
Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Vocational Nursing and Psychiatric Technicians of the Department of Consumer Affairs.

Dated: 6/6/12

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
LINDA K. SCHNEIDER
Supervising Deputy Attorney General


AMANDA DODDS
Senior Legal Analyst
Attorneys for Complainant

SD2011801373

Exhibit A

Statement of Issues No. VN-2010-2141

1 KAMALA D. HARRIS
Attorney General of California
2 LINDA K. SCHNEIDER
Supervising Deputy Attorney General
3 State Bar No. 101336
AMANDA DODDS
4 Senior Legal Analyst
110 West "A" Street, Suite 1100
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 645-2141
7 Facsimile: (619) 645-2061
Attorneys for Complainant

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9 **BEFORE THE**
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11
12 In the Matter of the Statement of Issues
Against:

Case No. VN-2010-2141

13 **SAMIRA AMALE EL-BEKRAOUI**
2111 Summit Drive
14 Escondido, CA 92025

STATEMENT OF ISSUES

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Statement of Issues
20 solely in her official capacity as the Executive Officer of the Board of Vocational Nursing and
21 Psychiatric Technicians, Department of Consumer Affairs.

22 2. On or about October 28, 2010, the Board of Vocational Nursing and Psychiatric
23 Technicians, Department of Consumer Affairs received an application for a Vocational Nurse
24 License from Samira Amale El-Bekraoui (Respondent). On or about September 7, 2010, Samira
25 Amale El-Bekraoui certified under penalty of perjury to the truthfulness of all statements,
26 answers, and representations in the application. The Board denied the application on August 16,
27 2011.

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JURISDICTION

3. This Statement of Issues is brought before the Board of Vocational Nursing and Psychiatric Technicians (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 2866 of the Code provides, in pertinent part, that the Board may deny a license when it finds that the applicant has committed any acts constituting grounds for denial of licensure under section 480 of that Code.

STATUTORY PROVISIONS

5. Section 475 of the Code states:

(a) Notwithstanding any other provisions of this code, the provisions of this division shall govern the denial of licenses on the grounds of:

(1) Knowingly making a false statement of material fact, or knowingly omitting to state a material fact, in an application for a license.

(2) Conviction of a crime.

(3) Commission of any act involving dishonesty, fraud or deceit with the intent to substantially benefit himself or another, or substantially injure another.

(4) Commission of any act which, if done by a licensee of the business or profession in question, would be grounds for suspension or revocation of license.

(b) Notwithstanding any other provisions of this code, the provisions of this division shall govern the suspension and revocation of licenses on grounds specified in paragraphs (1) and (2) of subdivision (a).

(c) A license shall not be denied, suspended, or revoked on the grounds of a lack of good moral character or any similar ground relating to an applicant's character, reputation, personality, or habits.

6. Section 480 of the Code states:

(a) A board may deny a license regulated by this code on the grounds that the applicant has one of the following:

(1) Been convicted of a crime. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action that a board is permitted to take following the establishment of a conviction may be taken when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code.

1 (2) Done any act involving dishonesty, fraud, or deceit with the intent to
2 substantially benefit himself or herself or another, or substantially injure another.

3 (3)(A) Done any act that if done by a licentiate of the business or profession
4 in question, would be grounds for suspension or revocation of license.

5 (B) The board may deny a license pursuant to this subdivision only if the
6 crime or act is substantially related to the qualifications, functions, or duties of the
7 business or profession for which application is made.

8 (b) Notwithstanding any other provision of this code, no person shall be denied
9 a license solely on the basis that he or she has been convicted of a felony if he or she
10 has obtained a certificate of rehabilitation under Chapter 3.5 (commencing with
11 Section 4852.01) of Title 6 of Part 3 of the Penal Code or that he or she has been
12 convicted of a misdemeanor if he or she has met all applicable requirements of the
13 criteria of rehabilitation developed by the board to evaluate the rehabilitation of a
14 person when considering the denial of a license under subdivision (a) of Section 482.

15 (c) A board may deny a license regulated by this code on the ground that the
16 applicant knowingly made a false statement of fact required to be revealed in the
17 application for the license.

18 7. Section 493 of the Code states:

19 Notwithstanding any other provision of law, in a proceeding conducted by a
20 board within the department pursuant to law to deny an application for a license or to
21 suspend or revoke a license or otherwise take disciplinary action against a person who
22 holds a license, upon the ground that the applicant or the licensee has been convicted
23 of a crime substantially related to the qualifications, functions, and duties of the
24 licensee in question, the record of conviction of the crime shall be conclusive
25 evidence of the fact that the conviction occurred, but only of that fact, and the board
26 may inquire into the circumstances surrounding the commission of the crime in order
27 to fix the degree of discipline or to determine if the conviction is substantially related
28 to the qualifications, functions, and duties of the licensee in question.

As used in this section, "license" includes "certificate," "permit," "authority,"
and "registration."

8. Section 2878 of the Code states:

The Board may suspend or revoke a license issued under this chapter [the
Vocational Nursing Practice Act (Bus. & Prof. Code, 2840, et seq.)] for any of the
following:

(a) Unprofessional conduct, which includes, but is not limited to, the
following:

....

(f) Conviction of a crime substantially related to the qualifications, functions,
and duties of a licensed vocational nurse, in which event the record of the conviction
shall be conclusive evidence of the conviction.

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1 (c) Violating or attempting to violate, directly or indirectly, or assisting in or
2 abetting the violation of, or conspiring to violate any provision or term of Chapter
6.5, Division 2 of the Business and Professions Code.

3 (d) Aiding or assisting, or agreeing to aid or assist any person or persons,
4 whether a licensed physician or not, in the performance of or arranging for a violation
5 of any of the provisions of Article 13, Chapter 5, Division 2 of the Business and
6 Professions Code.

7 (e) Conviction of a crime involving fiscal dishonesty.

8 (f) Any crime or act involving the sale, gift, administration, or furnishing of
9 "narcotics or dangerous drugs or dangerous devices" as defined in Section 4022 of the
10 Business and Professions Code.

11 12. California Code of Regulations, title 16, section 2522, states:

12 When considering a) the denial of a license under Section 480 of the Business
13 and Professions Code, b) the suspension or revocation of a license on the ground that
14 a licensee has been convicted of a crime, or c) a petition for reinstatement of a license
15 under Section 2787.7 of the Business and Professions Code, the Board in evaluating
16 the rehabilitation of an individual and his or her present eligibility for a license, will
17 consider the following criteria:

18 (1) Nature and severity of the act(s), offense(s), or crime(s) under consideration.

19 (2) Actual or potential harm to the public.

20 (3) Actual or potential harm to any patient.

21 (4) Overall disciplinary record.

22 (5) Overall criminal actions taken by any federal, state or local agency or court.

23 (6) Prior warnings on record or prior remediation.

24 (7) Number and/or variety of current violations.

25 (8) Mitigation evidence.

26 (9) In case of a criminal conviction, compliance with terms of sentence and/or
27 court-ordered probation.

28 (10) Time passed since the act(s) or offense(s) occurred.

(11) If applicable, evidence of proceedings to dismiss a conviction pursuant to
Penal Code section 1203.4.

(12) Cooperation with the Board and other law enforcement or regulatory
agencies.

(13) Other rehabilitation evidence.

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1 **PRAYER**

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that following the hearing, the Board of Vocational Nursing and Psychiatric Technicians
4 issue a decision:

- 5 1. Denying the application of Samira Amale El-Bekraoui for a Vocational Nurse
6 License;
7 2. Taking such other and further action as deemed necessary and proper.

8
9 DATED: January 12, 2012



TERESA BELLO-JONES, J.D., M.S.N., R.N.
Executive Officer
Board of Vocational Nursing and Psychiatric Technicians
Department of Consumer Affairs
State of California
Complainant

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